

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

MISSISSIPPI STATE CONFERENCE OF  
THE NATIONAL ASSOCIATION FOR  
THE ADVANCEMENT OF COLORED  
PEOPLE; DR. ANDREA WESLEY; DR.  
JOSEPH WESLEY; ROBERT EVANS;  
GARY FREDERICKS; PAMELA  
HAMNER; BARBARA FINN; OTHO  
BARNES; SHIRLINDA ROBERTSON;  
SANDRA SMITH; DEBORAH HULITT;  
RODESTA TUMBLIN; DR. KIA JONES;  
ANGELA GRAYSON; MARCELEAN  
ARRINGTON; VICTORIA ROBERTSON,

Plaintiffs,

v.

STATE BOARD OF ELECTION  
COMMISSIONERS; TATE REEVES, *in his  
official capacity as Governor of Mississippi*;  
LYNN FITCH, *in her official capacity as  
Attorney General of Mississippi*; MICHAEL  
WATSON, *in his official capacity as  
Secretary of State of Mississippi*,

Defendants.

**CIVIL ACTION NO.  
3:22-cv-734-DPJ-HSO-LHS**

**MOTION TO WITHDRAW**

Pursuant to L.U.Civ.R. 83.1(b)(3), the undersigned counsel for Plaintiffs Mississippi State Conference of the National Association for the Advancement of Colored People, Dr. Andrea Wesley, Dr. Joseph Wesley, Robert Evans, Gary Fredericks, Pamela Hamner, Barbara Finn, Otho Barnes, Shirlinda Robertson, Sandra Smith, Deborah Hulitt, Rodesta Tumblin, Dr. Kia Jones, Angela Grayson, Marcelean Arrington, Victoria Robertson (collectively “Plaintiffs”), respectfully move this Court for an order allowing the withdrawal of Jon M. Greenbaum as counsel of record for Plaintiffs in the above-styled case. Plaintiffs will continue to be represented in this litigation

by Morgan, Lewis & Bockius, LLP, Mississippi Center for Justice, Law Offices of Carroll Rhodes, the American Civil Liberties of Union of Mississippi, American Civil Liberties Union Foundation, and Lawyers' Committee for Civil Rights Under Law whose names and addresses are listed below.

The requested withdrawal will not affect the Plaintiffs or Defendants in this matter.

DATED: April 12, 2024

/s/ Joshua Tom

Joshua Tom, MSB 105392

*jtom@aclu-ms.org*

**ACLU OF MISSISSIPPI**

101 South Congress Street

Jackson, MS 39201

(601) 354-3408

Robert B. McDuff, MSB 2532

*rbm@mcdufflaw.com*

**MISSISSIPPI CENTER FOR JUSTICE**

767 North Congress Street

Jackson, MS 39202

(601) 969-0802

Carroll Rhodes, MSB 5314

**LAW OFFICES OF CARROLL RHODES**

*crhodes6@bellsouth.net*

PO Box 588

Hazlehurst, MS 39083

(601) 894-1464

John P. Lavelle, Jr.\*

**MORGAN, LEWIS & BOCKIUS LLP**

1701 Market Street

Philadelphia, PA 19103-2921

Telephone: +1.202.739.3000

Facsimile: +1.202.739.3001

*john.lavelle@morganlewis.com*

Drew C. Jordan\*

**MORGAN, LEWIS & BOCKIUS LLP**

1111 Pennsylvania Ave. NW

Washington, DC 20004-2541

Telephone: +1.713.890.5000

Respectfully submitted,

Ari J. Savitzky\*

*asavitzky@aclu.org*

Ming Cheung\*

*mcheung@aclu.org*

Casey Smith\*

*Csmith@aclu.org*

Garrett Muscatel\*

*Gmuscatel@aclu.org*

**ACLU FOUNDATION**

125 Broad Street

New York, New York 10004

(212) 549-2500

Patricia Yan\*

*pyan@aclu.org*

**ACLU FOUNDATION**

915 15th Street NW

Washington, DC 20005

(202) 457-0800

Ezra D. Rosenberg\*

*erosenberg@lawyerscommittee.org*

Jennifer Nwachukwu\*

*jnwachukwu@lawyerscommittee.org*

Jon M. Greenbaum\*

*jgreenbaum@lawyerscommittee.org*

David Rollins-Boyd\*

*drollins-boyd@lawyerscommittee.org*

Javon Davis\*

*jdavis@lawyerscommittee.org*

**LAWYERS' COMMITTEE FOR CIVIL  
RIGHTS UNDER LAW**

1500 K Street NW Suite 900

Washington, DC 20005

(202) 662-8600

Facsimile: +1.713.890.5001  
*drew.jordan@morganlewis.com*

*\* admitted pro hac vice*

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I, Joshua Tom, hereby certify that a true and correct copy of the foregoing document has been served on April 12, 2024, via the Court's ECF filing system, which sent notification of such filing to all counsel of record.

/s/Joshua Tom  
JOSHUA TOM